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ODIOWORKS, LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

CV 09

1818

ODIOWORKS, LLC,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No.

**ADMINISTRATIVE MOTION AND  
[PROPOSED] ORDER TO FILE UNDER  
SEAL PORTIONS OF EXHIBITS B, C  
AND D TO THE COMPLAINT**

Date:  
Time:  
Dept:  
Judge:

Date Comp. Filed: April 27, 2009

Trial Date:

**PROPOSED ORDER AND COMPLAINT OF  
ODIOWORKS, LLC V. APPLE INC. FILED  
HEREWITH**

ORIGINAL  
FILED  
09 APR 27 AM 9:30  
RICHARD H. WILKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

JCS

Plaintiff OdioWorks, LLC ("OdioWorks) submits this Request under Civil Local Rules 7-11 and 79-5(b) to file documents under seal in connection with OdioWorks' Complaint against Defendant Apple Inc ("Apple").

OdioWorks believes—and in this action, asks this Court to declare—that all of the material in Exhibits B, C, and D to its Complaint may lawfully be restored to OdioWorks' publicly available website, [www.BluWiki.com](http://www.BluWiki.com). Apple, though, has made clear to OdioWorks that Apple objects to the display of this material where the public can see it. *See* Exs. A and F to OdioWorks' Complaint (filed herewith).

Exhibit B to the Complaint is a non-public archival copy of a webpage entitled "Ipodhash," formerly posted at <http://BluWiki.com/go/Ipodhash>, as it appeared on November 14, 2008

Exhibit C to the Complaint is a non-public archival copy of a webpage entitled "Itunes\_obfuscation," formerly posted at [http://BluWiki.com/go/Itunes\\_obfuscation](http://BluWiki.com/go/Itunes_obfuscation), as it appeared on November 14, 2008.

Exhibit D to the Complaint is a non-public archival copy of a webpage entitled "IPodHash\_test\_data\_contribution," formerly posted at [http://BluWiki.com/go/IPodHash\\_test\\_data\\_contribution](http://BluWiki.com/go/IPodHash_test_data_contribution), as it appeared on November 14, 2008.

OdioWorks accordingly requests, out of courtesy to Apple, that the Court permit the sealing of Exhibits B, C, and D to its Complaint and order that the Clerk of the Court maintain them in accordance with the provisions of Local Civil Rule 79-5(f).

Dated: April 27, 2009

KEKER & VAN NEST LLP

By: 

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